

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

HONEYWELL INTERNATIONAL INC.,
HAND HELD PRODUCTS, INC., and
METROLOGIC INSTRUMENTS, INC.,

Plaintiffs,

v.

OPTO ELECTRONICS CO., LTD.,

*Defendant and
Counter Plaintiff,*

HONEYWELL INTERNATIONAL INC.,
HAND HELD PRODUCTS, INC., and
METROLOGIC INSTRUMENTS, INC.,

Counterclaim Defendants.

Case No. 3:21-cv-00506

JURY TRIAL DEMANDED

HONEYWELL’S STATEMENT OF EXPERT QUALIFICATIONS

Pursuant to the Revised Pretrial Order and Case Management Plan, Plaintiffs Honeywell International Inc., Hand Held Products, Inc., and Metrologic Instruments, Inc. (collectively, “Honeywell”), submit the following Statement of Expert Qualifications stating the education, experience, and qualifications of each expert witness that it may call at trial:

I. **Ryan Herrington** – Ryan Herrington is a Senior Managing Director at FTI Consulting. Mr. Herrington has more than 20 years of professional experience in applying financial, accounting, and economic principles to complex business dispute. Mr. Herrington has significant experience in disputes involving intellectual property, and he routinely assesses damages related to breach of contract and other loss events. Mr. Herrington has previously served

as an expert witness and testified in depositions and bench and jury trials. Mr. Herrington holds an M.B.A. from the University of Texas at Dallas. Mr. Herrington also received a B.B.A. in finance from Texas A&M University.

Mr. Herrington is an expert in the areas as set forth in his curriculum vitae (attached hereto as Exhibit A. Specifically, Honeywell intends on offering Mr. Herrington as an expert in accounting, economics, and competitive analysis. OPTO has stipulated to Mr. Herrington's qualifications.

II. **Craig Smith** – Mr. Craig Smith is an Imaging Technology Consultant and Owner of Chaotic Inertia, LLC. Mr. Smith has over 37 years of experience in digital imaging products and imaging algorithms. Mr. Smith has significant experience relating to analysis of source code relating to imaging algorithms including algorithms relating to the encoding and decoding of barcode symbologies. Mr. Smith has also previously served as an expert witness in the area of barcode scanning technology. Mr. Smith holds an M.S. in Computer Engineering from the University of Rochester Institute of Technology. Mr. Smith also received a B.S. in Electrical Engineering from the University of Cincinnati.

Mr. Smith is an expert in the areas as set forth in his curriculum vitae (attached hereto as Exhibit B. Specifically, Honeywell intends on offering Mr. Smith as an expert in source code, imaging algorithms, decoding algorithms, and barcode symbologies. OPTO objects to Mr. Smith being qualified as an expert in “barcode symbologies.”

III. **Dr. Ynjiun Wang** – Dr. Wang is the Chief Technology Officer at micro.AI.systems. Dr. Wang has over 30 years of experience in the barcode scanning industry and has significant experience with respect to the barcode symbology PDF417. Dr. Wang is regarded as a co-inventor of PDF417 and as developing one of the first imaging based handheld barcode

readers in the AIDC industry. Dr. Wang holds a Ph.D. in Computer Science from State University of New York at Stony Brook. Dr. Wang also received an M.S. in Computer Science from State University of New York at Stony Brook and a B.S. in Information Science from National Chiao-Tung University in Taiwan.

Dr. Wang is an expert in the areas as set forth in his curriculum vitae (attached hereto as Exhibit C. Specifically, Honeywell intends on offering Dr. Wang as an expert in PDF417 and microPDF417. OPTO has stipulated to Dr. Wang's qualifications.

IV. **David Taylor** – Mr. Taylor is Professor of Law and the Director of the Tsai Center for Law, Science, and Innovation at the Southern Methodist University Dedman School of Law. Mr. Taylor has 20 years of experience in the area of patent law including experience regarding procedure at the International Trade Commission and patent licensing agreements. Mr. Taylor holds a J.D. from Harvard Law School and a B.S. in Mechanical Engineering from Texas A&M University.

Mr. Taylor is an expert in the areas as set forth in his curriculum vitae (attached hereto as Exhibit D. Specifically, Honeywell intends on offering Mr. Taylor as an expert in patent licensing agreements and patent procedure. OPTO objects to Mr. Taylor being qualified as an expert as to “patent procedures” to the extent that includes ITC procedures. OPTO also objects to any opinion not set forth in his expert reports.

Dated: July 13, 2023

/s/ S. Benjamin Pleune

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M. Scott Stevens (NC Bar No. 37828)

Mark T. Calloway (NC Bar No. 10822)

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*Counsel for Plaintiffs and Counterclaim
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Metrologic Instruments, Inc.*

CERTIFICATE OF SERVICE

I certify that on July 13, 2023, a copy of the foregoing was served on counsel of record by filing the same with the Court's ECF system.

/s/ S. Benjamin Pleune